

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

Civil Action No. 25-cv-10676-BEM

U.S. DEPARTMENT OF HOMELAND SECURITY;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity; Pamela
BONDI, U.S. Attorney General, in her official
capacity; and Antone MONIZ, Superintendent,
Plymouth County Correctional Facility, in his official
capacity,

Defendants.

**INDEX OF EXHIBITS IN SUPPORT OF
PLAINTIFFS' REPLY IN SUPPORT OF PARTIAL SUMMARY JUDGMENT
AND OPPOSITION TO DEFENDANTS' MOTION TO DISMISS**

Exhibit	Description
A	Second Declaration of Tin Thanh Nguyen, dated November 13, 2025
B	Declaration of Alma Leonie David, dated December 5, 2025
C	Declaration of Sibusiso Magnificent Nhlabatsi, dated November 14, 2025, and Attachment (<i>Sibusiso Magnificent Nhlabatsi v. The Commissioner of Correctional Services & Another</i> [1623/2025] [2025] SZHC 224 (Oct. 27, 2025) (Decision of High Court of Eswatini))
D	Declaration of Jacqueline M. Brown, dated November 12, 2025
E	Declaration of Anwen Hughes, dated December 7, 2025
F	Declaration of Mia Unger, dated November 14, 2025
G	Declaration of Patrick Taurel, dated December 5, 2025, and Attachments (Declarations of K.S., E.A., and D.A., submitted in <i>D.A. v. Noem</i> , No. 1:25-cv-03135 (D.D.C.))
H	Declaration of Hannah Bridges, dated December 4, 2025
I	Declaration of Juanita Goebertus, dated December 5, 2025
J	Second Declaration of Guadalupe Perez, dated November 28, 2025
K	Declaration of Ana Dionne-Lanier, dated November 13, 2025
L	Declaration of Derrick J. Hensley, dated November 10, 2025
M	Declaration of Jessica A. Dawgert, dated October 8, 2025

N	Declaration of Florence Weinberg, dated December 5, 2025
O	Letter re: Coercive Third Country Deportations and Abusive Conditions of Confinement in Immigration Detention at Fort Bliss, TX (Camp East Montana), dated December 8, 2025, and Attachments (Exhs. A – D, Declarations of “Isaac,” “Benjamin,” “Abel,” and “Eduardo”), available at https://www.aclu.org/documents/ice-letter-re-fort-bliss and https://www.aclu.org/documents/fort-bliss-declarations-december-2025
P	Declaration of Laura Belous, dated December 8, 2025, and Attachments (Plaintiff O.C.G.’s release order and Order of Supervision)
Q	Declaration of [REDACTED], dated November 19, 2025
R	Declaration of [REDACTED], dated November 28, 2025, and Attachments (copies of electronic tickets for flights from Nicaragua to Caracas, Venezuela and from Caracas, Venezuela to Tehran, Iran)
S	Declaration of [REDACTED], dated November 14, 2025
T	Declaration of [REDACTED], dated November 13, 2025
U	Declaration of [REDACTED], dated November 26, 2025
V	Declaration of [REDACTED], dated November 14, 2025
W	Declaration of [REDACTED], dated November 11, 2025
X	Declaration of [REDACTED], dated November 7, 2025
Y	Declaration of [REDACTED], dated October 28, 2025

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

s/ Trina Realmuto

Trina Realmuto

National Immigration Litigation Alliance

Dated: December 8, 2025